

MIDDLEBROOKS SHAPIRO, P.C.

841 Mountain Avenue, First Floor

Springfield, New Jersey 07081

(973) 218-6877

Angela Nascondiglio Stein, Esq.

anstein@middlebrooksshapiro.com

Attorneys for the Chapter 13 Debtors

In re:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	
GERARD RISOLI and	:	Honorable Stacey L. Meisel
ANGELA M. RISOLI,	:	
	:	Case No. 19-24147 (SLM)
Chapter 13 Debtors.	:	Chapter 13
	:	

**RESPONSE ON BEHALF OF THE DEBTORS TO TRUSTEE'S OBJECTION TO
CONFIRMATION OF CHAPTER 13 PLAN**

GERARD RISOLI and ANGELA M. RISOLI, the Chapter 13 Debtors in the instant matter (the "Debtors"), by and through their counsel, Middlebrooks Shapiro, P.C. ("MSPC"), respectfully submit this Response to the Trustee's Objection to Confirmation of Chapter 13 Plan:

1. On July 23, 2019, the Debtors filed their Chapter 13 Plan (the "Plan") by and through MSPC. *See*, Docket No. 8.

2. On October 1, 2019, the Trustee filed an Objection to Confirmation of the Plan. *See*, Docket No. 26.

3. A review of the Debtors' Schedules I and J shows a surplus of \$99.65, or about \$100.00 monthly, which is what the Plan proposes. *See*, Docket Nos. 1 and 8.

4. Angela M. Risoli's ("Debtor 2") income from her second job (Oracle) fluctuates monthly. Schedule I reflects the average income from Debtor 2's second job at the time of filing this case. *See*, Docket No. 1.

5. In addition, an amended Disclosure of Chapter 13 Debtor's Attorney Compensation was filed on July 23, 2019 reflecting attorney fees of \$1,500.00 to be paid through the Plan, which is also what the Plan reflects. *See*, Docket Nos. 7 and 8. On September 3, 2019, the Trustee's Office confirmed via email that the Disclosure of Chapter 13 Debtor's Attorney Compensation had been corrected.

6. Given the foregoing, the Debtors, by and through MSPC, respectfully request that the Court enter an Order Confirming Chapter 13 Plan.

Respectfully submitted,

MIDDLEBROOKS, SHAPIRO, P.C.
Attorneys for the Chapter 13 Debtor

/s/ Angela Nascondiglio Stein
By: Angela Nascondiglio Stein, Esq.

Dated: October 3, 2019